

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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SEP 23 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)

Amendment of Section 73.202(b))
Table of Allotments,) MM Docket No. 96-161
FM Broadcast Stations) RM-8842
(Carlisle, Irvine and)
Morehead, Kentucky))

TO: Chief, Allocations Branch,
Rules and Policies Division,
Mass Media Bureau

DOCKET FILE COPY ORIGINAL

**COMMENTS AND COUNTERPROPOSAL
OF EAST KENTUCKY BROADCASTING CORPORATION**

East Kentucky Broadcasting Corporation ("East Kentucky"), licensee of Station WPKE-FM, Elkhorn City, Kentucky, by its attorney and pursuant to Sections 1.415 and 1.420(d) of the Commission's Rules, hereby submits its Comments and Counterproposal in response to the Notice of Proposed Rule Making released by the Commission in the above-captioned proceeding on August 2, 1996 (DA 96-1185) (hereinafter "Notice"). The Notice looks toward amending the FM Table of Allotments, Section 73.207(b) of the Commission's Rules, (a) by substituting Channel 221C3 for Channel 264A at Carlisle, Kentucky, and by modifying the license of Station WCAK(FM), Carlisle, to specify operation on Channel 221C3 at Carlisle; (b) by substituting Channel 264C3 for Channel 291A at Irvine, Kentucky, and by modifying the license of Station WCYO(FM), Irvine, to specify operation on

Channel 221C3 at Irvine; and (c) by substituting Channel 291C3 for Channel 221A at Morehead, Kentucky, and by modifying the license of Station WMOR(FM), Morehead, to specify operation on Channel 291C3 at Morehead.

East Kentucky urges the Commission to consider two alternative proposals in this proceeding either of which would result in the facilities of Station WPKE-FM being upgraded to Channel 221C3. As shown in the attached Technical Report prepared by Charles M. Anderson (the "Technical Report"), the first alternative is consistent with and, in fact, dependent upon the above-noted proposals advanced in this proceeding, and therefore, qualifies as supportive comments. The second conflicts with the proposals set forth in the Notice and thereby qualifies as a counterproposal.

PROPOSAL 1: Channel 221C3 Incompatible Swap

As the FCC pointed out in its Notice, Section 1.420(g)(3) of the Commission's Rules allows the modification of an FM station's license to a higher class channel if the channel is a co-channel or adjacent channel mutually exclusive with the existing license. However, the Commission has a policy of considering analogous proposals involving channel substitutions at other communities which would be necessary to create a mutually-exclusive relationship required under Section 1.402(g)(3) of the Rules. Such "incompatible channel swaps" are considered on a case-by-

case basis. See Modification of FM Broadcast License to Higher Class Co-Channel or Adjacent Channels, 60 RR 2d 114 (1986).

East Kentucky's first alternative requests an incompatible channel swap with Station WDIC-FM, Clinchco, Virginia, whereby Station WPKE-FM would be upgraded to Channel 221C3 by swapping its Channel 276A assignment for Station WDIC-FM's Channel 221A assignment. The proposal qualifies for an incompatible swap because there is no other channel which can be substituted at the WDIC-FM site to free up its 221A channel. The Technical Report contains (a) a full preclusion study demonstrating the unavailability of any channel other than Station WPKE-FM's for substitution at the WDIC-FM site (Exhibit E-8), and (b) demonstrates that Channel 221C3 may be assigned to Elkhorn City at a site 5.1 km northwest in full compliance with the Commission's minimum spacing requirements (Exhibit E-1). Moreover, Channel 276A (which is presently assigned to Station WPKE-FM) may be swapped from Station WDIC-FM's assigned channel in full compliance with the Commission's minimum spacing requirements (Exhibit E-2). The proposed Channel 221C3 assignment will place a 70 dBu over the entire community of Elkhorn City and will obtain line of sight to Elkhorn City (Exhibits E-6 and E-7).

PROPOSAL 2: Counterproposal

East Kentucky also proposes another means of obtaining the upgrade of Channel WPKE-FM. As noted above, this alternative

qualifies as a counterproposal because it requests an alternate channel at Morehead to that proposed in this proceeding. This proposal requests the substitution of Channel 275A for Station WMOR(FM)'s Channel 221A at Morehead (see Exhibit E-3), and either Channel 269A (see Exhibit E-4) or Channel 295A (see Exhibit E-5) for Station WLKS's Channel 275A at West Liberty, Kentucky. The same incompatible swap of Station WPKE-FM's Channel 276A at Elkhorn City for Station WDIC-FM's Channel 221A at Clinchco, Virginia is also proposed (see Exhibits E-1 and Exhibit E-2).

Public Interest Benefits: Population and Area Gains

As documented in the Technical Report, the proposed upgrade of Station WPKE-FM will result in a population within the 60 dBu contour of 161,244 and an area of 4,803 square kilometers based on a maximum, uniform C3 39.1 km contour. The population represents a net increase of 111,857 (226%) over the licensed facility of Station WPKE-FM (.12 kw/426 m HAAT), and an area gain of 3,233 square kilometers (206%). A uniform 39.1 km 60 dBu for the proposed 221C3 facility would entirely encompass the licensed 60 dBu of Station WPKE-FM.

A summary of the proposals advanced by East Kentucky is set forth on page 3 of the Technical Report. If the Commission were to amend its FM Table of Allotments by upgrading the facilities of Station WPKE-FM, East Kentucky will promptly file an application to operate on Channel 221C3 at Elkhorn City and if

the application is granted, will proceed immediately with the construction of the newly-authorized facilities.

Respectfully submitted,

EAST KENTUCKY BROADCASTING CORPORATION

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September 23, 1996

TECHNICAL REPORT

This technical report has been developed on behalf of East Kentucky Broadcasting Company (East KY), licensee of WPKE-FM at Elkhorn City, KY in support of comments and a counterproposal in response to a Notice of Proposed Rulemaking (NPRM) in MM Docket No. 96-161 - RM-8842 which proposes upgrades for FM facilities in Carlisle, Irvine, and Morehead, KY. East KY is proposing two alternatives by which WPKE-FM would be upgraded to channel 221C3. The first alternative is consistent with and, in fact, depend upon the proposals advanced in MM Docket 96-161 thus qualifying as supportive comments. The second conflicts with the Docket 96-161 proposals. And thereby qualifies as a counterproposal.

PROPOSAL #1 - 221C3 INCOMPATIBLE SWAP

East KY's first alternative (#1), requests an incompatible swap with WDIC-FM at Clinchco, VA whereby WPKE-FM is upgraded to channel 221C3 by swapping its 276A assignment for WDIC's 221A assignment. The proposal qualifies for an incompatible swap because there is no other channel which can be substituted at the WDIC-FM site to free up its 221A channel. A full preclusion study demonstrating the unavailable of any channel other than WPKE-FM's for substitution at the WDIC-FM site is included as Exhibit E-8.

Exhibit E-1 demonstrates that 221C3 may be assigned to Elkhorn City at a site 5.1 km km northwest in full compliance with the Commission's spacing requirements at an arbitrary site located at coordinates:

N 37-20-31 W 82-23-07.

Exhibit E-2 demonstrates that channel 276A presently assigned to WPKE-FM may be swapped for WDIC-FM's assigned channel in full compliance with the Commission's spacing

requirements. Exhibit E-6 shows that the proposed 221C3 assignment will place a 70 dBu over the entire community of Elkhorn City, and Exhibit E-7 demonstrates that the proposed 221C3 will obtain line of sight to Elkhorn City.

PROPOSAL #2 - COUNTERPROPOSAL

East KY also proposes another means of obtaining the upgrade of WPKE-FM. This proposal qualifies as a counterproposal because it requests an alternate channel at Morehead to that proposed in MM Docket No. 96-161. This proposal requests the substitution of 275A for WMOR-FM's 221A at Morehead (see Exhibit E-3), and either 269A (see Exhibit E-4) or 295A (see Exhibit E-5) for WLKS's 275A at West Liberty, KY. The same incompatible swap of WPKE-FM's 276A at Elkhorn City for WDIC-FM's 221A at Clinchco, VA is also proposed (see Exhibit E-1 and Exhibit E-2).

POPULATION AND AREA GAINS

The proposed upgrade of WPKE-FM as proposed herein will result in a population within the 60 dBu contour of 161,244 and an area of 4,803 square kilometers based on a maximum, uniform C3 39.1 km contour. The population represents a net increase of 111,857 (226%) over the licensed WPKE-FM facility (.12 kw/ 426 m HAAT), and an area gain of 3,233 square kilometers (206%). A uniform 39.1 km 60 dBu for the proposed 221C3 facility would entirely encompass the licensed WPKE-FM 60 dBu.

SUMMARY OF PROPOSALS

Proposal #1

Community	Present	Proposed	Coordinates
Carlisle,KY	264A	221C3	N 38-17-42 W 83-52-32
Irvine, KY	291A	264C3	N 37-43-27 W 84-02-38
Morehead, KY	221A	291C3	WMOR-FM SITE
Elkhorn City	276A	221C3	N 37-20-31 w 82-23-07
Clinchco	221A	276A	WDIC-FM SITE

Proposal #2

Elkhorn City	276A	221C3	N 37-20-31 w 82-23-07 5.1 km northwest
Clinchco	221A	276A	WDIC-FM Site
Morehead, KY	221A	275A	WMOR-FM Site
West Liberty, KY	275A	269A or 295A	WLKS-FM Site

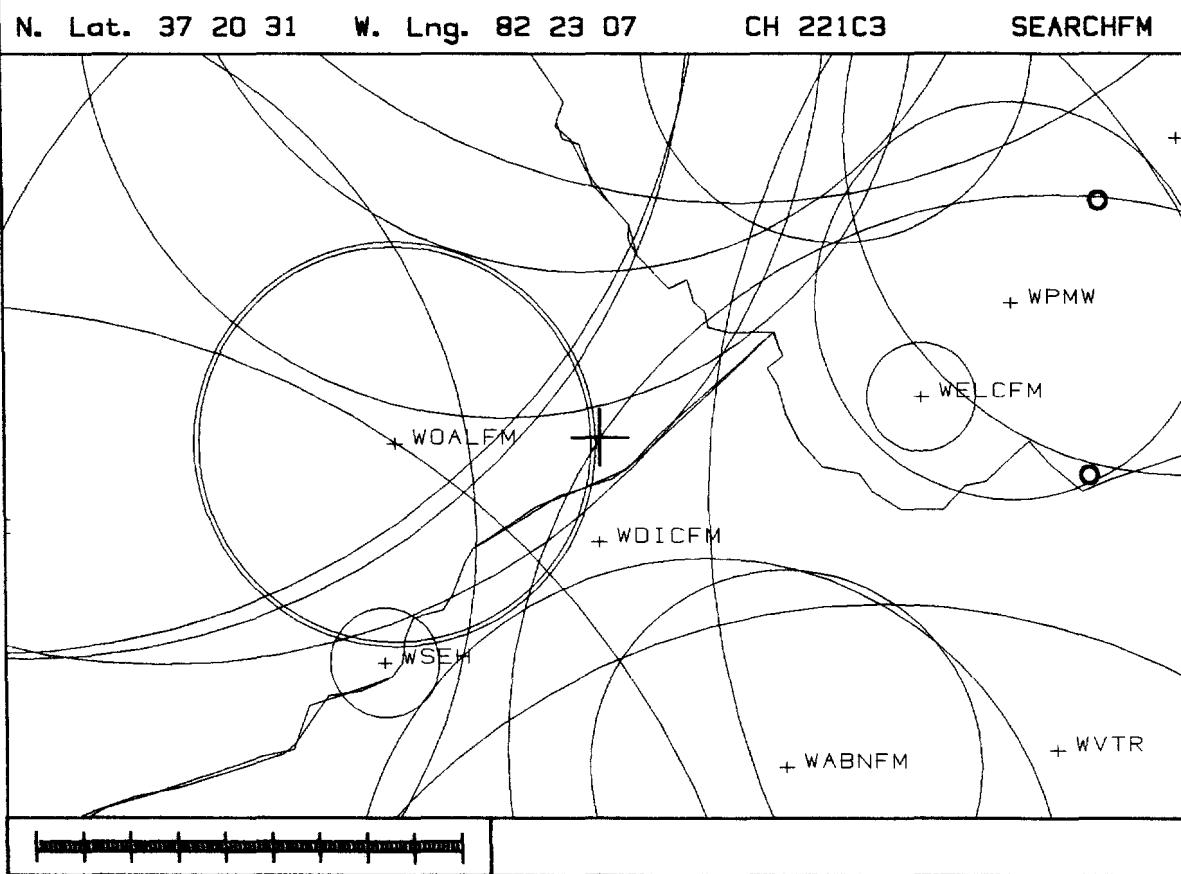


EXHIBIT E-1

Call	CH#	Location	D-KM	Azi	FCC	Margin	
WDICFM	221A	Clinchco	VA	21.86	181.0	141.5	-119.64
WMORFM	221A	Morehead	KY	132.14	315.3	141.5	-9.36
WVTR	220C2	Marion	VA	116.61	124.2	116.5	0.11
WOALFM	219C3	Pippa Passes	KY	43.42	268.3	42.5	0.92
WOALFM	219A	Pippa Passes	KY	43.42	268.3	41.5	1.92
WSAC	222A	Louisa	KY	94.98	347.1	88.5	6.48
DE221	221A	Morehead	KY	154.38	308.0	141.5	12.88
AD221	221A	Owingsville	KY	154.38	308.0	141.5	12.88
AD221	221C3	Carlisle	KY	168.55	309.4	152.5	16.05
WXLK	222C	Roanoke	VA	198.82	93.9	175.5	23.32
WYGE	222C2	London	KY	144.16	262.0	116.5	27.66
WHCB	218C1	Bristol	TN	103.20	167.4	75.5	27.70
WUOT	220C	Knoxville	TN	203.25	223.5	175.5	27.75
WMEJ	220A	Proctorville	OH	123.45	358.7	88.5	34.95
WABNFM	224A	Abingdon	VA	79.34	150.7	41.5	37.84
WMNCFM	221A	Morganton	NC	186.11	161.3	141.5	44.61
WPMW	224A	Mullens	WV	91.80	71.9	41.5	50.30
WMPOFM	221A	Middleport	OH	192.87	8.8	141.5	51.37
WSEH	274A	Cumberland	KY	65.78	224.1	11.5	54.28
WZACFM	223A	Danville	WV	96.94	31.6	41.5	55.44
WELCFM	275A	Welch	WV	68.63	82.8	11.5	57.13
WVPB	219B	Beckley	WV	137.75	63.0	70.5	67.25

CHARLES M. ANDERSON
BROADCAST CONSULTANT

EXHIBIT E-2

REFERENCE		DISPLAY DATES
37 08 42 N	CLASS = A	DATA 09-13-96
82 23 22 W	Current Spacings	SEARCH 09-14-96
----- Channel 221 - 92.1 MHz -----		

Call	Channel	Location	Dist	Azi	FCC	Margin	
WDICFM LI	221A	Clinchco	VA	0.00	0.0	114.5	-114.50
WVTR LI	220C2	Marion	VA	106.25	114.3	105.5	0.75
WOALFM CP	219C3	Pippa Passes	KY	47.69	295.6	41.5	6.19
WHCB LI	218C1	Bristol	TN	82.11	163.9	74.5	7.61
WOALFM LI	219A	Pippa Passes	KY	47.69	295.6	30.5	17.19
WUOT LI	220C	Knoxville	TN	187.75	228.0	164.5	23.25
WABNFM LI	224A	Abingdon	VA	61.49	140.3	30.5	30.99
WMORFM LI	221A	Morehead	KY	148.21	321.3	114.5	33.71
WXLK LI	222C	Roanoke	VA	198.91	87.6	164.5	34.41
WYGE LI	222C2	London	KY	142.39	270.7	105.5	36.89
AD221 AD	221C3	Carlisle	KY	182.92	314.8	141.5	41.42
WSEH LI	274A	Cumberland	KY	52.08	240.9	9.5	42.58
WSAC LI	222A	Louisa	KY	116.32	349.7	71.5	44.82
WMNCFM LI	221A	Morganton	NC	165.70	158.7	114.5	51.20
DE221 DE	221A	Morehead	KY	168.41	314.0	114.5	53.91
AD221 AD	221A	Owingsville	KY	168.41	314.0	114.5	53.91
WELCFM LI	275A	Welch	WV	74.93	65.9	9.5	65.43
WPMW LI	224A	Mullens	WV	101.07	60.0	30.5	70.57
WMEJ LI	220A	Proctorville	OH	145.30	359.0	71.5	73.80

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EXHIBIT E-3

REFERENCE			CLASS = A		DISPLAY DATES		
38 10 53 N					DATA 09-13-96		
83 26 55 W			Current Spacings		SEARCH 09-17-96		
----- Channel 275 - 102.9 MHz -----							
Call	Channel	Location		Dist	Azi	FCC	Margin
WLKSFM LI	275A	West Liberty	KY	18.64	148.8	114.5	-95.86
WMORFM LI	221A	Morehead	KY	0.00	0.0	9.5	-9.50
WRAC LI	276A	West Union	OH	76.42	349.4	71.5	4.92
WXJJ.C CP	275A	Mount Vernon	KY	123.36	224.9	114.5	8.86
WUGO LI	272A	Grayson	KY	44.50	68.2	30.5	14.00
DE221 DE	221A	Morehead	KY	28.70	271.5	9.5	19.20
AD221 AD	221A	Owingsville	KY	28.70	271.5	9.5	19.20
WINGFM LI	275B	Springfield	OH	200.01	349.7	177.5	22.51
WEBN LI	274B	Cincinnati	OH	139.07	319.3	112.5	26.57
WTCRFM LI	277B	Huntington	WV	95.33	73.5	68.5	26.83
AD221 AD	221C3	Carlisle	KY	39.45	288.8	11.5	27.95
WVSRFM LI	274B	Charleston	WV	157.04	82.3	112.5	44.54
WWLT LI	276A	Manchester	KY	117.63	194.2	71.5	46.13
WCYNFM LI	272A	Cynthiana	KY	80.26	288.8	30.5	49.76
WXZZ LI	277A	Georgetown	KY	89.36	259.8	30.5	58.86
WSAC LI	222A	Louisa	KY	71.95	90.2	9.5	62.45
WELCFM LI	275A	Welch	WV	182.34	117.3	114.5	67.84
WPKEFM LI	276A	Elkhorn City	KY	139.58	136.4	71.5	68.08
WPKEFM CP	276A	Elkhorn City	KY	139.58	136.4	71.5	68.08
WLTO LI	273A	Nicholasville	KY	100.60	247.5	30.5	70.10

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EXHIBIT E-4

REFERENCE

38 02 16 N

83 20 18 W

CLASS = A

Current Spacings

DISPLAY DATES

DATA 09-13-96

SEARCH 09-17-96

----- Channel 269 - 101.7 MHz -----

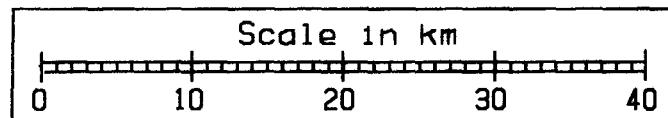
Call		Channel	Location		Dist	Azi	FCC	Margin
WLRO	LI	268C3	Richmond	KY	88.55	258.8	88.5	0.05
WSGS	LI	266C	Hazard	KY	94.68	171.6	94.5	0.18
WVOWFM	LI	270B	Logan	WV	121.82	99.1	112.5	9.32
WUGO	LI	272A	Grayson	KY	45.31	44.3	30.5	14.81
WMGG	LI	268B	Gallipolis	OH	129.16	48.3	112.5	16.66
WLJC	LI	271A	Beattyville	KY	56.91	212.7	30.5	26.41
WAGX	LI	267A	Manchester	OH	69.00	335.1	30.5	38.50
WKRQ	LI	270B	Cincinnati	OH	156.84	320.2	112.5	44.34
ALOPEN	AL	269A	Shelbyville	KY	160.36	277.6	114.5	45.86
WTHQ.A	AP	269A	Shelbyville	KY	161.88	277.5	114.5	47.38
WQUT	LI	268C	Johnson City	TN	215.47	155.5	164.5	50.97
WCYNFM	LI	272A	Cynthiana	KY	95.31	296.1	30.5	64.81
AP216	AP	216A	Ashland	KY	78.46	52.4	9.5	68.96
WEKH	LI	215C1	Hazard	KY	94.72	171.9	21.5	73.22

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EXHIBIT E-5

REFERENCE		DISPLAY DATES
38 02 16 N	CLASS = A	DATA 09-13-96
83 20 18 W	Current Spacings	SEARCH 09-17-96
----- Channel 295 - 106.9 MHz -----		

Call	Channel	Location	Dist	Azi	FCC	Margin	
DE296	DE 296A	Owingsville	KY	41.85	293.7	71.5	-29.65
WKCA	LI 296A	Owingsville	KY	41.85	293.7	71.5	-29.65
WMLV.C	CP 296A	Ironton	OH	80.37	46.1	71.5	8.87
WMLV	LI 296A	Ironton	OH	80.66	46.0	71.5	9.16
WIKO	LI 242A	Morehead	KY	18.74	329.0	9.5	9.24
WKCBFM	LI 296A	Hindman	KY	85.55	156.2	71.5	14.05
WSRWFM	LI 294B	Hillsboro	OH	127.42	349.5	112.5	14.92
WFLEFM	LI 292A	Flemingsburg	KY	46.51	333.3	30.5	16.01
WVKM	LI 294C3	Matewan	WV	111.57	114.7	88.5	23.07
WJSNFM	LI 293A	Jackson	KY	54.80	185.2	30.5	24.30
WKXOFM	LI 294A	Berea	KY	97.41	232.7	71.5	25.91
WVEZFM	LI 295B	Louisville	KY	220.99	280.5	177.5	43.49
WMIT	LI 295C	Black Mountain	NC	272.22	159.6	225.5	46.72
WMIT	LI 295C	Black Mountain	NC	272.22	159.6	225.5	46.72
WMGE	LI 296A	Danville	KY	132.15	252.6	71.5	60.65
WMGE.C	CP 296A	Danville	KY	132.15	252.6	71.5	60.65
ALOPEN	AL 292B1	Milton	WV	109.97	62.8	47.5	62.47
WZLK	LI 298A	Virgie	KY	99.64	137.0	30.5	69.14



1:500,000

INTERCHK

+ 37.5
83

6

+ 37
83

221C3 221C3 - .001kW

+ 37
82.5

+ 37.5
82.5

+221C3

Elkhorn City

WPKE-F

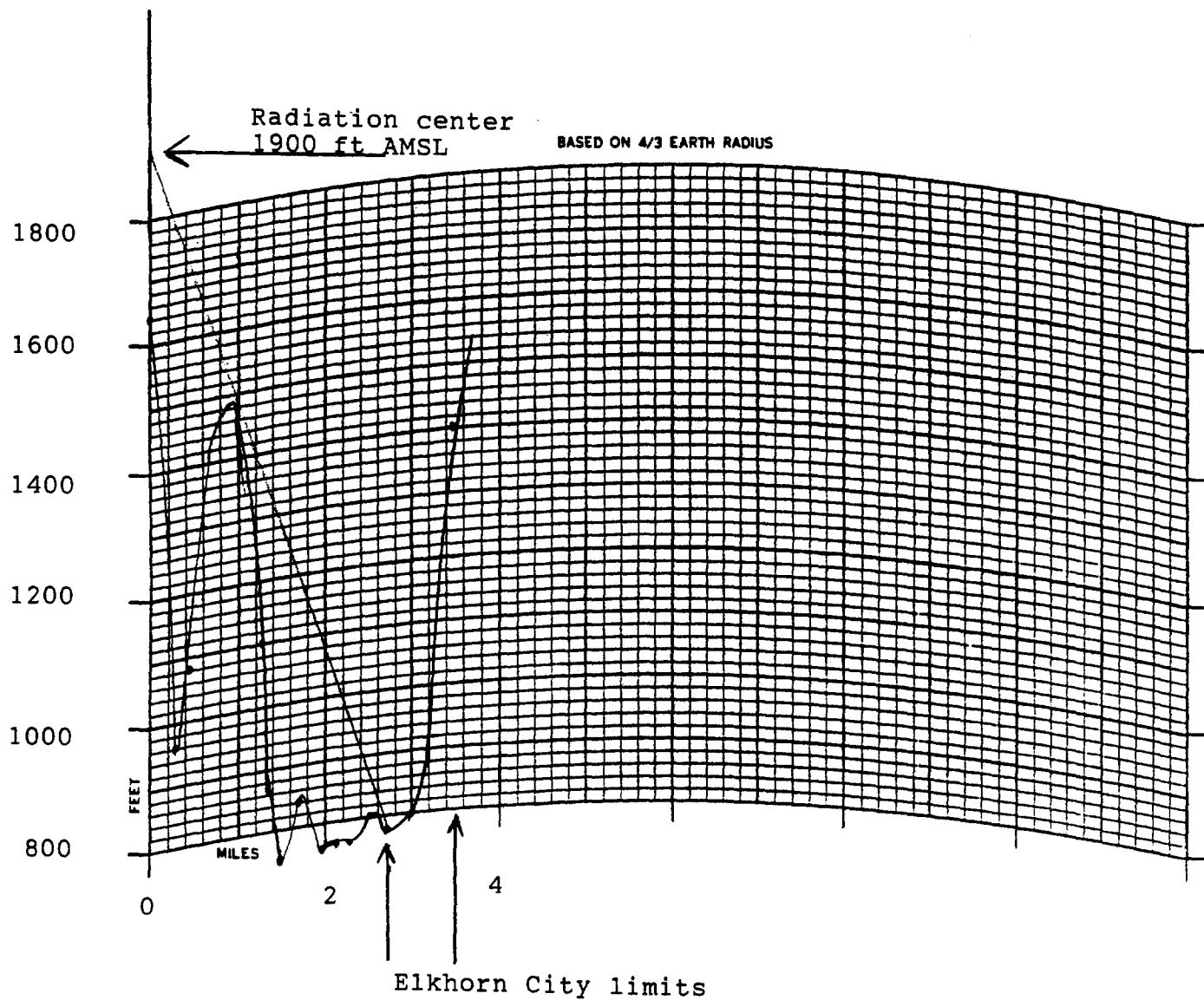
WPKE-FM 276A - .001kW

+ 37
82

EXHIBIT E-6

70 dBu (Uniform C3 - 23.2 km)

EXHIBIT E-7



Terrain data from Elkhorn City and Hellier 7.5 minute topographic quadrangles on 144 degree True radial.

CHARLES ANDERSON BROADCAST CONSULTANT
1519 Euclid Ave Bowling Green KY 42101

WDIC PRECLUSION

EXHIBIT E-8

REFERENCE							DISPLAY DATES	
37 08 42 N							DATA 09-13-96	
82 23 22 W							SEARCH 09-17-96	
Current rules spacings								
CLASS A PRECLUSIONS								

	CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN
221A	WDICFM	221A	Clinchco	VA	0.0	0.0	115.0	-115.00 *
222	WDICFM	221A	Clinchco	VA	0.0	0.0	72.0	-72.00 *
	WYGE	222C2	London	KY	270.2	142.4	166.0	-23.61 <
	WXLK	222C	Roanoke	VA	88.3	198.9	226.0	-27.09 *
223	WDICFM	221A	Clinchco	VA	0.0	0.0	31.0	-31.00 *
	WESCFM	223C	Greenville	SC	185.1	223.6	226.0	-2.41 <
	WABNFM	224A	Abingdon	VA	140.3	61.5	72.0	-10.51 *
	WDHR	226C2	Pikeville	KY	338.1	38.4	55.0	-16.62 <
224A	WDICFM	221A	Clinchco	VA	0.0	0.0	31.0	-31.00 *
	WABNFM	224A	Abingdon	VA	140.3	61.5	115.0	-53.51 *
	WPMW	224A	Mullens	WV	60.4	101.1	115.0	-13.93 *
	WDHR	226C2	Pikeville	KY	338.1	38.4	55.0	-16.62 <
225	WABNFM	224A	Abingdon	VA	140.3	61.5	72.0	-10.51 *
	WDHR	226C2	Pikeville	KY	338.1	38.4	106.0	-67.62 *
	WAXM	228C2	Big Stone Gap	VA	240.3	51.7	55.0	-3.26 <
226	WDHR	226C2	Pikeville	KY	338.1	38.4	166.0	-127.62 *
	WAXM	228C2	Big Stone Gap	VA	240.3	51.7	55.0	-3.26 <
227	WDHR	226C2	Pikeville	KY	338.1	38.4	106.0	-67.62 *
	WFNQ	227C	Forest City	NC	176.1	208.3	226.0	-17.69 <
	WAXM	228C2	Big Stone Gap	VA	240.3	51.7	106.0	-54.26 *
	WMEVFM	230C	Marion	VA	109.7	80.0	95.0	-14.96 <
228A	WDHR	226C2	Pikeville	KY	338.1	38.4	55.0	-16.62 <
	WAXM	228C2	Big Stone Gap	VA	240.3	51.7	166.0	-114.26 *
	WMEVFM	230C	Marion	VA	109.7	80.0	95.0	-14.96 <
229	WDHR	226C2	Pikeville	KY	338.1	38.4	55.0	-16.62 <
	WAXM	228C2	Big Stone Gap	VA	240.3	51.7	106.0	-54.26 *
	WDGG	229C1	Ashland	KY	350.1	140.0	200.0	-60.04 *
	WMEVFM	230C	Marion	VA	109.7	80.0	165.0	-84.96 *
	WIFXFM	232C2	Jenkins	KY	263.0	31.2	55.0	-23.76 <
230	WAXM	228C2	Big Stone Gap	VA	240.3	51.7	55.0	-3.26 <
	WMEVFM	230C	Marion	VA	109.7	80.0	226.0	-145.96 *
	WIFXFM	232C2	Jenkins	KY	263.0	31.2	55.0	-23.76 <
231	WAXM	228C2	Big Stone Gap	VA	240.3	51.7	55.0	-3.26 <
	WMEVFM	230C	Marion	VA	109.7	80.0	165.0	-84.96 *
	WAXS	231B	Oak Hill	WV	50.5	141.9	178.0	-36.13 *
	WIFXFM	232C2	Jenkins	KY	263.0	31.2	106.0	-74.76 *
232A	WMEVFM	230C	Marion	VA	109.7	80.0	95.0	-14.96 <
	WIFXFM	232C2	Jenkins	KY	263.0	31.2	166.0	-134.76 *
233	WMEVFM	230C	Marion	VA	109.7	80.0	95.0	-14.96 <
	WIFXFM	232C2	Jenkins	KY	263.0	31.2	106.0	-74.76 *
	WKLWFM	234C3	Paintsville	KY	333.2	80.8	89.0	-8.20 <

CHARLES ANDERSON BROADCAST CONSULTANT
1519 Euclid Ave Bowling Green KY 42101

CLASS A

	CALL	CH#	CITY	STATE	BEAR'	D-KM	R-KM	MARGIN
234	WIFXFM	232C2	Jenkins	KY	263.0	31.2	55.0	-23.76 <
	WKLWFM	234C3	Paintsville	KY	333.2	80.8	142.0	-61.20 *
	WIKQ	235C	Greeneville	TN	192.8	121.6	165.0	-43.36 *
235	WIFXFM	232C2	Jenkins	KY	263.0	31.2	55.0	-23.76 <
	WKLWFM	234C3	Paintsville	KY	333.2	80.8	89.0	-8.20 <
	WPVR	235C	Roanoke	VA	88.3	198.7	226.0	-27.29 *
236	WIKQ	235C	Greeneville	TN	192.8	121.6	226.0	-104.36 *
	WQHY	238C	Prestonsburg	KY	332.0	69.2	95.0	-25.76 *
	WIKQ	235C	Greeneville	TN	192.8	121.6	165.0	-43.36 *
237A	WQHY	238C	Prestonsburg	KY	332.0	69.2	95.0	-25.76 *
	WXBX	237A	Rural Retreat	VA	103.7	105.0	115.0	-10.00 *
	WQHY	238C	Prestonsburg	KY	332.0	69.2	165.0	-95.76 *
238	WQHY	238C	Prestonsburg	KY	332.0	69.2	226.0	-156.76 *
239	WQHY	238C	Prestonsburg	KY	332.0	69.2	165.0	-95.76 *
	WXRC	239C	Hickory	NC	147.6	222.2	226.0	-3.76 <
240A	AD240	240C2	Colonial Heights	TN	198.6	64.6	106.0	-41.36 *
	WQHY	238C	Prestonsburg	KY	332.0	69.2	95.0	-25.76 *
	AD240	240C2	Colonial Heights	TN	198.6	64.6	166.0	-101.36 *
	WALEYFM	240A	Princeton	WV	83.3	108.4	115.0	-6.62 <
241	WXCC	243B	Williamson	WV	10.4	59.1	69.0	-9.86 <
	WQHY	238C	Prestonsburg	KY	332.0	69.2	95.0	-25.76 *
	AD240	240C2	Colonial Heights	TN	198.6	64.6	106.0	-41.36 *
	WKWS	241B	Charleston	WV	22.0	146.0	178.0	-32.02 *
	WYWYFM	241C3	Barbourville	KY	257.0	137.9	142.0	-4.13 <
242	WXCC	243B	Williamson	WV	10.4	59.1	69.0	-9.86 <
	WXBQFM	245C	Bristol	TN	164.0	82.2	95.0	-12.83 <
	WXCC	243B	Williamson	WV	10.4	59.1	178.0	-118.86 *
243	WXBQFM	245C	Bristol	TN	164.0	82.2	95.0	-12.83 <
	WXCC	243B	Williamson	WV	10.4	59.1	113.0	-53.86 *
	WXCC	243B	Williamson	WV	10.4	59.1	165.0	-82.83 *
244A	WXBQFM	245C	Bristol	TN	164.0	82.2	165.0	-82.83 *
	WXCC	243B	Williamson	WV	10.4	59.1	113.0	-53.86 *
	WXCC	243B	Williamson	WV	10.4	59.1	178.0	-118.86 *
245	WXBQFM	245C	Bristol	TN	164.0	82.2	95.0	-12.83 <
	WXCC	243B	Williamson	WV	10.4	59.1	69.0	-9.86 <
	WXBQFM	245C	Bristol	TN	164.0	82.2	226.0	-143.83 *
246	WXCC	243B	Williamson	WV	10.4	59.1	69.0	-9.86 <
	WXBQFM	245C	Bristol	TN	164.0	82.2	165.0	-82.83 *
	WKBCFM	247C	North Wilkesboro	NC	136.4	163.7	165.0	-1.33 <
247	WMJD	249A	Grundy	VA	54.1	29.8	31.0	-1.24 <
	WXBQFM	245C	Bristol	TN	164.0	82.2	95.0	-12.83 <
	WRLVFM	247A	Salyersville	KY	318.7	90.6	115.0	-24.44 *
248	WKBCFM	247C	North Wilkesboro	NC	136.4	163.7	226.0	-62.33 *
	WMJD	249A	Grundy	VA	54.1	29.8	31.0	-1.24 <
	WXBQFM	245C	Bristol	TN	164.0	82.2	95.0	-12.83 <
	WKBCFM	247C	North Wilkesboro	NC	136.4	163.7	165.0	-1.33 <
	WJXB	248C	Knoxville	TN	227.6	186.9	226.0	-39.09 *
	WQBEOFM	248B	Charleston	WV	22.7	151.8	178.0	-26.24 *
	WMJD	249A	Grundy	VA	54.1	29.8	72.0	-42.24 *

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249A	WMJD	249A	Grundy	VA	54.1	29.8	115.0	-85.24 *
	WZQQ	250C3	Hyden	KY	274.3	70.8	89.0	-18.19 <
250	WMJD	249A	Grundy	VA	54.1	29.8	72.0	-42.24 *
	WZQQ	250C3	Hyden	KY	274.3	70.8	142.0	-71.19 *
251	WBRF	251C	Galax	VA	115.0	154.0	165.0	-10.97 <
	WTFM	253C	Kingsport	TN	194.4	70.8	95.0	-24.15 *
251	WTFM	253C	Kingsport	TN	164.1	82.3	95.0	-12.71 <
	WMJD	249A	Grundy	VA	54.1	29.8	31.0	-1.24 <
251	WZQQ	250C3	Hyden	KY	274.3	70.8	89.0	-18.19 <
	WBRF	251C	Galax	VA	115.0	154.0	226.0	-71.97 *
251	WTFM	253C	Kingsport	TN	194.4	70.8	95.0	-24.15 *
	WTFM	253C	Kingsport	TN	164.1	82.3	95.0	-12.71 <
252A	WMJD	249A	Grundy	VA	54.1	29.8	31.0	-1.24 <
	WBRF	251C	Galax	VA	115.0	154.0	165.0	-10.97 <
252A	WTFM	253C	Kingsport	TN	194.4	70.8	165.0	-94.15 *
	WTFM	253C	Kingsport	TN	164.1	82.3	165.0	-82.71 *
253	WTFM	253C	Kingsport	TN	194.4	70.8	226.0	-155.15 *
253	WTFM	253C	Kingsport	TN	164.1	82.3	226.0	-143.71 *
254	WTFM	253C	Kingsport	TN	194.4	70.8	165.0	-94.15 *
254	WTFM	253C	Kingsport	TN	164.1	82.3	165.0	-82.71 *
255	WSIPFM	255C1	Paintsville	KY	333.2	80.9	133.0	-52.11 *
255	WTFM	253C	Kingsport	TN	194.4	70.8	95.0	-24.15 *
255	WTFM	253C	Kingsport	TN	164.1	82.3	95.0	-12.71 <
255	WSIPFM	255C1	Paintsville	KY	333.2	80.9	200.0	-119.11 *
256	WSPAFM	255C	Spartanburg	SC	177.7	219.3	226.0	-6.68 <
256	WTFM	253C	Kingsport	TN	194.4	70.8	95.0	-24.15 *
256	WTFM	253C	Kingsport	TN	164.1	82.3	95.0	-12.71 <
256	WSIPFM	255C1	Paintsville	KY	333.2	80.9	133.0	-52.11 *
256	WSLQ	256C	Roanoke	VA	88.4	198.4	226.0	-27.57 *
256	AD256	256A	Jonesville	VA	230.8	89.5	115.0	-25.50 *
256	AP256	256A	Jonesville	VA	232.8	91.8	115.0	-23.16 *
256	ALOPEN	256A	Jonesville	VA	230.8	89.5	115.0	-25.50 *
256	AP256	256A	Jonesville	VA	232.3	91.2	115.0	-23.79 *
256	WAEZ	257C3	Elizabethton	TN	168.6	84.1	89.0	-4.88 <
256	DE257	257C3	Elizabethton	TN	164.2	82.3	89.0	-6.69 <
256	AD257	257C2	Elizabethton	TN	171.1	90.2	106.0	-15.77 <
256	WZQK.C	259C3	Coeburn	VA	217.8	33.2	42.0	-8.83 <
256	WZQK.C	259A	Coeburn	VA	203.4	24.1	31.0	-6.88 <
257A	WAEZ	257C3	Elizabethton	TN	168.6	84.1	142.0	-57.88 *
257A	DE257	257C3	Elizabethton	TN	164.2	82.3	142.0	-59.69 *
257A	AD257	257C2	Elizabethton	TN	171.1	90.2	166.0	-75.77 *
257A	WZQK.C	259C3	Coeburn	VA	217.8	33.2	42.0	-8.83 <
257A	WZQK.C	259A	Coeburn	VA	203.4	24.1	31.0	-6.88 <
258	WAEZ	257C3	Elizabethton	TN	168.6	84.1	89.0	-4.88 <
258	DE257	257C3	Elizabethton	TN	164.2	82.3	89.0	-6.69 <
258	AD257	257C2	Elizabethton	TN	171.1	90.2	106.0	-15.77 <

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	WJLSFM	258B	Beckley	WV	66.4	123.3	178.0	-54.72 *
	WKDPFM	258C2	Corbin	KY	261.5	142.9	166.0	-23.10 <
	WZQK.C	259C3	Coeburn	VA	217.8	33.2	89.0	-55.83 *
	WZQK.C	259A	Coeburn	VA	203.4	24.1	72.0	-47.88 *
259	WZQK.C	259C3	Coeburn	VA	217.8	33.2	142.0	-108.83 *
	WZQK.C	259A	Coeburn	VA	203.4	24.1	115.0	-90.88 *
260	WZQK.C	259C3	Coeburn	VA	217.8	33.2	89.0	-55.83 *
	WZQK.C	259A	Coeburn	VA	203.4	24.1	72.0	-47.88 *
	WMTCFM	260A	Vancleve	KY	298.7	106.7	115.0	-8.27 *
	WKSF	260C	Asheville	NC	189.8	193.6	226.0	-32.37 *
	WVAF	260B	Charleston	WV	29.9	150.2	178.0	-27.80 *
	WTZEFM	261A	Tazewell	VA	91.1	70.6	72.0	-1.43 <
	WMDJFM	261A	Allen	KY	329.5	56.9	72.0	-15.09 *
261A	WZQK.C	259C3	Coeburn	VA	217.8	33.2	42.0	-8.83 <
	WZQK.C	259A	Coeburn	VA	203.4	24.1	31.0	-6.88 <
	WTZEFM	261A	Tazewell	VA	91.1	70.6	115.0	-44.43 *
	WMDJFM	261A	Allen	KY	329.5	56.9	115.0	-58.09 *
262	WZQK.C	259C3	Coeburn	VA	217.8	33.2	42.0	-8.83 <
	WZQK.C	259A	Coeburn	VA	203.4	24.1	31.0	-6.88 <
	WTZEFM	261A	Tazewell	VA	91.1	70.6	72.0	-1.43 <
	WMDJFM	261A	Allen	KY	329.5	56.9	72.0	-15.09 *
	WOKIFM	262C	Oak Ridge	TN	237.4	195.3	226.0	-30.71 *
263	WKEE	263B	Huntington	WV	356.9	138.7	178.0	-39.28 *
	WRICFM	264A	Richlands	VA	89.1	43.6	72.0	-28.41 *
	WSGS	266C	Hazard	KY	274.4	70.5	95.0	-24.48 *
264	WRICFM	264A	Richlands	VA	89.1	43.6	115.0	-71.41 *
	AP264	264A	Bulls Gap	TN	215.9	112.1	115.0	-2.94 <
	WSGS	266C	Hazard	KY	274.4	70.5	95.0	-24.48 *
265A	WRICFM	264A	Richlands	VA	89.1	43.6	72.0	-28.41 *
	WEMY	265A	Princeton	WV	81.0	113.6	115.0	-1.37 <
	WSGS	266C	Hazard	KY	274.4	70.5	165.0	-94.48 *
266	WSGS	266C	Hazard	KY	274.4	70.5	226.0	-155.48 *
267	WSGS	266C	Hazard	KY	274.4	70.5	165.0	-94.48 *
	WQUT	268C	Johnson City	TN	177.4	97.4	165.0	-67.64 *
268	WSGS	266C	Hazard	KY	274.4	70.5	95.0	-24.48 *
	WQUT	268C	Johnson City	TN	177.4	97.4	226.0	-128.64 *
269A	WSGS	266C	Hazard	KY	274.4	70.5	95.0	-24.48 *
	WQUT	268C	Johnson City	TN	177.4	97.4	165.0	-67.64 *
	WVOWFM	270B	Logan	WV	25.1	87.3	113.0	-25.67 *
	WDXC	272A	Pound	VA	271.9	22.7	31.0	-8.31 *
270	WVOWFM	270B	Logan	WV	25.1	87.3	178.0	-90.67 *
	WDXC	272A	Pound	VA	271.9	22.7	31.0	-8.31 *
271	WVOWFM	270B	Logan	WV	25.1	87.3	113.0	-25.67 *
	WMYU	271C1	Sevierville	TN	217.8	187.2	200.0	-12.79 <
	WDXC	272A	Pound	VA	271.9	22.7	72.0	-49.31 *
272A	WDXC	272A	Pound	VA	271.9	22.7	115.0	-92.31 *

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273	WDXC	272A	Pound	VA	271.9	22.7	72.0	-49.31 *
	WOLDFM	273A	Marion	VA	109.6	80.2	115.0	-34.84 *
	WSEH	274A	Cumberland	KY	240.8	52.1	72.0	-19.92 *
	WPKEFM	276A	Elkhorn City	KY	10.7	13.9	31.0	-17.10 *
	WPKEFM	276A	Elkhorn City	KY	10.7	13.9	31.0	-17.10 *
274	WDXC	272A	Pound	VA	271.9	22.7	31.0	-8.31 *
	WSEH	274A	Cumberland	KY	240.8	52.1	115.0	-62.92 *
	WVSRFM	274B	Charleston	WV	25.3	148.8	178.0	-29.19 *
	WPKEFM	276A	Elkhorn City	KY	10.7	13.9	31.0	-17.10 *
	WPKEFM	276A	Elkhorn City	KY	10.7	13.9	31.0	-17.10 *
275	WDICFM	221A	Clinchco	VA	0.0	0.0	10.0	-10.00 *
	WDXC	272A	Pound	VA	271.9	22.7	31.0	-8.31 *
	WSEH	274A	Cumberland	KY	240.8	52.1	72.0	-19.92 *
	WELCFM	275A	Welch	WV	66.2	74.9	115.0	-40.07 *
	WPKEFM	276A	Elkhorn City	KY	10.7	13.9	72.0	-58.10 *
276A	WPKEFM	276A	Elkhorn City	KY	10.7	13.9	72.0	-58.10 *
	WDICFM	221A	Clinchco	VA	0.0	0.0	10.0	-10.00 *
	WSMGFM	276A	Tusculum	TN	190.9	114.9	115.0	-0.05 <
	WPKEFM	276A	Elkhorn City	KY	10.7	13.9	115.0	-101.10 *
	WPKEFM	276A	Elkhorn City	KY	10.7	13.9	115.0	-101.10 *
277	WPKEFM	276A	Elkhorn City	KY	10.7	13.9	72.0	-58.10 *
	WPKEFM	276A	Elkhorn City	KY	10.7	13.9	72.0	-58.10 *
	WTCRFM	277B	Huntington	WV	359.6	141.5	178.0	-36.51 *
	WIMZFM	278C	Knoxville	TN	226.8	163.8	165.0	-1.23 <
	WPKEFM	276A	Elkhorn City	KY	10.7	13.9	31.0	-17.10 *
278	WPKEFM	276A	Elkhorn City	KY	10.7	13.9	31.0	-17.10 *
	WIMZFM	278C	Knoxville	TN	226.8	163.8	226.0	-62.23 *
	WZVA.C	278A	Marion	VA	109.9	90.3	115.0	-24.70 *
	WPKEFM	276A	Elkhorn City	KY	10.7	13.9	31.0	-17.10 *
	WPKEFM	276A	Elkhorn City	KY	10.7	13.9	31.0	-17.10 *
279	WIMZFM	278C	Knoxville	TN	226.8	163.8	165.0	-1.23 <
	WCIRFM	279B	Beckley	WV	47.0	130.6	178.0	-47.42 *
	WXKQ	280A	Whitesburg	KY	258.2	38.4	72.0	-33.61 *
	WXKQ	280A	Whitesburg	KY	258.2	38.4	115.0	-76.61 *
	WXIS	280A	Erwin	TN	179.7	111.8	115.0	-3.20 <
281	WXKQ	280A	Whitesburg	KY	258.2	38.4	72.0	-33.61 *
	WTQR	281C	Winston-Salem	NC	115.4	199.1	226.0	-26.86 *
	WPAYFM	281C	Portsmouth	OH	342.9	183.1	226.0	-42.86 *
	WEYE	282A	Surgoinsville	TN	212.3	91.2	115.0	-23.84 *
	WHAJ	283C	Bluefield	WV	83.5	107.9	165.0	-57.10 *
282	WHAJ	283C	Bluefield	WV	83.5	107.9	226.0	-118.10 *
	WJMD	284A	Hazard	KY	274.3	70.8	72.0	-1.19 <
	WHAJ	283C	Bluefield	WV	83.5	107.9	165.0	-57.10 *
	WJMD	284A	Hazard	KY	274.3	70.8	115.0	-44.19 *
	WXLR	285A	Harold	KY	347.8	44.1	72.0	-27.94 *
284	WKOS	285A	Kingsport	TN	184.7	65.8	72.0	-6.18 <

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285A	WJMD	284A	Hazard	KY	274.3	70.8	72.0	-1.19 <
	WXLR	285A	Harold	KY	347.8	44.1	115.0	-70.94 *
	WKOS	285A	Kingsport	TN	184.7	65.8	115.0	-49.18 *
286	WXLR	285A	Harold	KY	347.8	44.1	72.0	-27.94 *
	WKOS	285A	Kingsport	TN	184.7	65.8	72.0	-6.18 <
	WTUK	286A	Harlan	KY	251.6	85.4	115.0	-29.60 *
287	WLCLCFM	286B	St. Albans	WV	16.1	147.4	178.0	-30.58 *
	WAGIFM	287C	Gaffney	SC	163.9	199.4	226.0	-26.60 *
	WGTHFM	288A	Richlands	VA	88.8	55.1	72.0	-16.93 *
288A	WXKZFM	288A	Prestonsburg	KY	329.6	65.9	72.0	-6.14 <
	WGTHFM	288A	Richlands	VA	88.8	55.1	115.0	-59.93 *
	WSWVFM	288A	Pennington Gap	VA	231.9	73.9	115.0	-41.05 *
289	WXKZFM	288A	Prestonsburg	KY	329.6	65.9	115.0	-49.14 *
	WGTHFM	288A	Richlands	VA	88.8	55.1	72.0	-16.93 *
	WXKZFM	288A	Prestonsburg	KY	329.6	65.9	72.0	-6.14 <
290	WFMX	289C	Statesville	NC	134.0	209.9	226.0	-16.12 <
	WLJQ.A	290C3	Colonial Heights	TN	194.4	70.8	89.0	-18.15 <
	WNVAFM	292A	Norton	VA	221.7	26.6	31.0	-4.42 <
291	WLJQ.A	290C3	Colonial Heights	TN	194.4	70.8	142.0	-71.15 *
	WTNJ	290B	Mount Hope	WV	52.1	133.9	178.0	-44.07 *
	WLJQ.C	290A	Colonial Heights	TN	180.7	76.9	115.0	-38.12 *
292A	AOPEN	290C3	Colonial Heights	TN	191.6	89.7	142.0	-52.29 *
	AOPEN	290C3	Colonial Heights	TN	191.5	89.7	142.0	-52.31 *
	DE291	291A	Saltville	VA	116.8	65.8	72.0	-6.16 <
293	CP291	291A	Saltville	VA	116.8	65.8	72.0	-6.16 <
	WNVAFM	292A	Norton	VA	221.7	26.6	31.0	-4.42 <
	WLJQ.A	290C3	Colonial Heights	TN	194.4	70.8	89.0	-18.15 <
294	AD291	291C3	Jefferson	NC	130.2	114.3	142.0	-27.67 *
	DE291	291A	Saltville	VA	116.8	65.8	115.0	-49.16 *
	AD291	291C3	Jefferson	NC	133.6	111.8	142.0	-30.25 *
294	CP291	291A	Saltville	VA	116.8	65.8	115.0	-49.16 *
	AD291	291C3	Jefferson	NC	130.6	114.3	142.0	-27.71 *
	WNVAFM	292A	Norton	VA	221.7	26.6	72.0	-45.42 *
294	DE291	291A	Saltville	VA	116.8	65.8	72.0	-6.16 <
	CP291	291A	Saltville	VA	116.8	65.8	72.0	-6.16 <
	WNVAFM	292A	Norton	VA	221.7	26.6	115.0	-88.42 *
294	WBDFYFM	292A	Bluefield	VA	83.3	108.4	115.0	-6.60 <
	WNVAFM	292A	Norton	VA	221.7	26.6	72.0	-45.42 *
	WEND	293C	Salisbury	NC	135.0	220.9	226.0	-5.05 <
294	WJDT	293A	Rogersville	TN	219.8	110.3	115.0	-4.68 <
	WJSNFM	293A	Jackson	KY	296.5	99.6	115.0	-15.40 *
	WVKM	294C3	Matewan	WV	18.8	54.9	89.0	-34.06 *
294	WNVAFM	292A	Norton	VA	221.7	26.6	31.0	-4.42 <
	WVKM	294C3	Matewan	WV	18.8	54.9	142.0	-87.06 *
	WMIT	295C	Black Mountain	NC	176.6	156.7	165.0	-8.27 <
	WMIT	295C	Black Mountain	NC	176.6	156.7	165.0	-8.27 <

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295	WNVAFM	292A	Norton	VA	221.7	26.6	31.0	-4.42 <
	WVKM	294C3	Matewan	WV	18.8	54.9	89.0	-34.06 *
	WMIT	295C	Black Mountain	NC	176.6	156.7	226.0	-69.27 *
	WMIT	295C	Black Mountain	NC	176.6	156.7	226.0	-69.27 *
	WKCBFM	296A	Hindman	KY	292.8	53.7	72.0	-18.28 *
	WZLK	298A	Virgie	KY	328.5	30.6	31.0	-0.43 <
	WMIT	295C	Black Mountain	NC	176.6	156.7	165.0	-8.27 <
296A	WMIT	295C	Black Mountain	NC	176.6	156.7	165.0	-8.27 <
	WKCBFM	296A	Hindman	KY	292.8	53.7	115.0	-61.28 *
	WXLZFM	297A	Lebanon	VA	151.4	38.1	72.0	-33.93 *
	WZLK	298A	Virgie	KY	328.5	30.6	31.0	-0.43 <
	WKCBFM	296A	Hindman	KY	292.8	53.7	72.0	-18.28 *
297	WCTTFM	297C2	Corbin	KY	259.9	153.0	166.0	-13.01 <
	WXLZFM	297A	Lebanon	VA	151.4	38.1	115.0	-76.93 *
	WKAZ	297B	Miami	WV	31.3	146.7	178.0	-31.33 *
	WZLK	298A	Virgie	KY	328.5	30.6	72.0	-41.43 *
	WXLZFM	297A	Lebanon	VA	151.4	38.1	72.0	-33.93 *
298	WZLK	298A	Virgie	KY	328.5	30.6	115.0	-84.43 *
	WBYY	299A	Cedar Bluff	VA	87.9	55.2	72.0	-16.79 *
	WZLK	298A	Virgie	KY	328.5	30.6	72.0	-41.43 *
	WIVKFM	299C	Knoxville	TN	217.8	187.2	226.0	-38.76 *
	WBYY	299A	Cedar Bluff	VA	87.9	55.2	115.0	-59.79 *
300	WZLK	298A	Virgie	KY	328.5	30.6	31.0	-0.43 <
	WBYY	299A	Cedar Bluff	VA	87.9	55.2	72.0	-16.79 *
	WWSR	300C	Charlotte	NC	151.3	225.2	226.0	-0.77 <
	WWSR	300B	Huntington	WV	4.8	148.2	178.0	-29.78 *

CERTIFICATION

Charles M. Anderson hereby certifies that;

His qualifications in broadcast allocation matters are a matter of record before the Federal Communications Commission having been presented and accepted on many occasions in the past;

That he holds a lifetime General Radiotelephone license (#PG-6-7352), a bachelors degree in the physical sciences from Western Kentucky University, and advanced degrees from the University of North Carolina and Indiana University;

That the accompanying technical report and exhibits were developed by him personally or under his immediate supervision and that all the information presented therein is true and correct to the best of his knowledge and belief.

/s/ 

Charles M. Anderson

September 17, 1996

Disclaimer: Charles M. Anderson assumes no liability for any errors or omissions in the information, exhibits and report provided herein; and, shall not be liable for any injuries or damages (including consequential) which might result from use of said information, exhibits and report. Filing of this report with the Federal Communications Commission constitutes acceptance in full of the terms and conditions stated above.

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CERTIFICATE OF SERVICE

I, Anastasia C. Chung, hereby certify that I have, on this 23rd day of September, 1996, sent by first-class mail, postage prepaid, copies of the foregoing "Comments and Counterproposal of East Kentucky Broadcasting Corporation" to the following:

* Ms. Sharon P. McDonald
Mass Media Bureau, Room 569
Federal Communications Commission
2000 M Street, N.W.
Washington, D.C. 20554

James S. Neely, Esq.
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Washington, DC 20033

Counsel for James P. Gray, Kentucky River
Broadcasting Company and WMOR, Inc.


Anastasia C. Chung

* By Hand